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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

ISREAL MODESTO MARTINEZ,)	Case No.: 2:22-cv-02044-AC
Plaintiff,)	STIPULATION AND PROPOSED ORDER
)	FOR AN EXTENSION OF TIME
vs.)	
KILOLO KIJAKAZI,)	
Acting Commissioner of Social Security,)	
Defendant.)	

Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of record, that the time for Defendant to respond to Plaintiff's Motion for Summary Judgment be extended thirty (30) days from May 15, 2023, up to and including June 14, 2023. This is the Defendant's first request for an extension.

Defendant requests this extension in good faith and with good reason. Defendant's undersigned counsel currently has another district court brief due on the same day as this case. He has two district court briefs due the prior Friday, May 12, 2023, as well as a motion to dismiss. He is actively working on a Ninth Circuit answering brief due May 24, 2023, which will need to undergo internal reviews. Additionally, he has work duties specific to answering new Complaints, with 20 such assignments he has completed for the following two weeks, which

1 have resulted in five voluntary remands. He therefore seeks an extension to allow more time to
2 review the record in this case and respond appropriately to Plaintiff's Motion for Summary
3 Judgment.

4 The parties further stipulate that the Court's Scheduling Order shall be modified
5 accordingly.

6 Respectfully submitted,

7 Dated: May 5, 2023

/s/ Matthew Holmberg*
(*as authorized via e-mail on May 5, 2023)
MATTHEW HOLMBERG
Attorney for Plaintiff

10 Dated: May 5, 2023

PHILLIP A. TALBERT
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MATHEW W. PILE
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14 By: /s/ Edmund Darcher
EDMUND DARCHER
Special Assistant U.S. Attorney
Attorneys for Defendant

18 **ORDER**

19 Pursuant to the parties' stipulation, IT IS SO ORDERED that Defendant shall have an
20 extension, up to and including June 14, 2023, to respond to Plaintiff's Motion for Summary
21 Judgment.

23 DATED: May 8, 2023

Allison Claire
ALLISON CLAIRE
UNITED STATES MAGISTRATE JUDGE